

## Torres, Francine

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**From:** dantodd@pacific.net%inter2 [dantodd@pacific.net] on behalf of dantodd@pacific.net  
**Sent:** Wednesday, August 17, 2005 1:45 AM  
**To:** National List  
**Subject:** NOP sunset review

Dear Mr. Neal and the National Organic Standards Board, I support the renewal of the existing exemptions for several materials being considered for sunsetting from the National List.

For insect control; Horticultural Oils, Elemental Sulfur, Lime Sulfur, Soaps and Pheromones. Each of these materials are important to my organic pear growing operation. Two of these materials are indispensable, Horticultural Oils and Pheromones. Horticultural Oils help control Psylla, Mites and Coddling Moth. Pheromones also help control Coddling Moth. For Codling Moth these materials need to be used together to be effective. Either by themselves does not give adequate control. Mites and Psylla have both seriously affected the health of my trees over the years, in some cases causing significant defoliation.

Horticultural Oils are the only material that can control these pests.

For plant disease control; Fixed Coppers, Lime Sulfur, Elemental Sulfur. Streptomycin and Tetracycline are all important materials.

Without the Copper, Sulfur and especially the Lime Sulfur to control pear scab, I would simply close my doors, push out my pear trees and go out of business. Here in California we have had a particularly difficult growing season. Above normal rainfall late into the season led to ideal conditions for disease problems. Even using the above materials we still have seventy per cent of our pears infected with the scab fungus. In most years these materials allow us to produce clean marketable fruit and without them based on replicated trials done by the local farm advisor we would have fifty to one hundred per cent damage from scab.

Streptomycin and Tetracycline for fire blight control are also important.

I believe that if these and other materials are removed from the allowed list not only does it seriously affect my operation, my employees and my customers, but it would end organic agriculture as we know it. I do not believe that is an overstatement.

I have been growing pears organically since 1976 and I am the largest producer of organic pears in California.

Thank you for your attention to my concerns.

Daniel B. Todd

Todd Organic Orchards, Inc.